

VIA OVERNIGHT MAIL

Mr. K. David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505 REC'D TN REGULATORY AUTH.

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OFFICE OF THE

MARK ALLEN
DEBORAH GODWIN
SAMUEL MORRIS*
EUGENE LAURENZI
LEE J. BLOOMFIELD
BARCLAY M. ROBERTS
TIMOTHY TAYLOR
BOBBY F. MARTIN, JR.

PARALEGALS: LIBBY BELT ANDREA M. SCALES CAFFI M. KIRK LAURA R. PERRY

ALSO ADMITTED IN INDIANA

RE: Application of Memphis Networx, LLC for a Certificate of Public Convenience and Necessity to Provide Interstate Telecommunication Services and Joint Petition of Memphis Light, Gas & Water Division, a Division of the City of Memphis, Tennessee ("MLG&W") and A&L Networx-Tennessee, LLC ("A&L") for Approval of an Agreement Between MLG&W and A&L Regarding

Ownership of Memphis Networx, LLC

TRA Docket No. 99-00909

Dear Mr. Waddell:

Please find enclosed an original and thirteen (13) copies of the Response of Intervenor International Brotherhood of Electrical Workers, Local 1288 to Objection to Certain Pre-Filed Testimony of Brent E. Hall on Behalf of IBEW Local 1288 and Motion to Strike AND Witness List of Intervenor International Brotherhood of Electrical Workers, Local 1288. Copies have been served on all parties of record.

Sincerely,

ALLEN, GODWIN, MORRIS,

LAURENZI & BLOOMFIELD, P.C.

LEE J. BLOOMFIELD

Attorney at Law

LJB:cmk Enclosures

cc: Richard Collier, Esquire, Tennessee Regulatory Authority
D. Billye Sanders, Esquire, Waller, Lansden, Dortch & Davis
John Knox Walkup, Esquire, Wyatt, Lansden, Dortch & Davis

Ward Huddleston, Memphis Networx

J. Maxwell Williams, Esquire, MLG&W

Henry Walker, Esquire, Boult, Cummings, et al.

Charles B. Welch, Esquire, Farris, Mathews, et al.

Guy Hicks, Esquire, Patrick Turner, Esquire, Bellsouth Telecommunications, Inc.